



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen  
Governor

Becky Norton Dunlap  
Secretary of Natural Resources

WEST CENTRAL REGIONAL OFFICE  
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Thomas L. Hopkins  
Director

Thomas L. Henderson  
Regional Director

July 3, 1996

Mr. Richard Stewart  
Micrometric Systems Inc  
2900 W RT 58  
Meadows of Dan VA 24120

RE: RCRA Inspection on May 29, 1996  
Micrometric Systems Inc  
Meadows of Dan; Patrick County  
VAD075612564

Dear Mr. Stewart:

Thank you very much for your cooperation during the compliance evaluation inspection (CEI) conducted at the above referenced facility on May 29, 1996 by the Virginia Department of Environmental Quality West Central Regional Office (DEQ). During this inspection, the facility was evaluated for compliance with the Virginia Hazardous Waste Management Regulations (VHWMR) as a Large Quantity Generator. Checklists completed for this inspection are enclosed in this report.

Based upon review of observations, responses, and documents obtained during this inspection, the Department has information that areas of non-compliance of the Virginia Waste Management Act (1950 Code of Virginia, as amended, § 10.1-1400, et seq.) and/or applicable regulations of the VHWMR have occurred at the facility. The areas of non-compliance are noted in the checklists and as summarized below:

1. ***In apparent non-compliance with VHWMR § 6.4.E.1.e, the facility failed to designate and notify the DEQ of the exact location of an existing container storage accumulation area.*** As discovered and discussed at great length during the inspection, containers were stored at Building A in an undefined 90-day accumulation area. The two 55-gallon containers contained filters, gloves, adsorbents, Chrome 1000, and Chrome Reagent Waste (labeled as Hazardous Waste while pending analytical results) from the Chrome plating area.

This area of non-compliance was corrected on 6/5/96 during the continuation of the original inspection date, when it was observed that the facility had this area properly designated and managed as a 90-day accumulation area. Please keep in mind that weekly inspections and accumulation logs must also be maintained for this accumulation area. No further action is required on your part in regard to this deficiency.

Micrometric Systems Inc.  
July 3, 1996

2. ***In apparent non-compliance with VHWMR § 9.8.E and § 9.1.F.4, the facility failed to inspect areas where containers are stored weekly, and to maintain an inspection log or summary.*** Although the facility has maintained weekly inspection logs for all container storage areas, it was discovered during the inspection that such weekly logs were not maintained for the Building B accumulation area for the weeks of 2/17/96 through 4/19/96 (last weekly record was 2/10/96 and resuming again on 4/26/96). As per our discussions during the inspection, you believed that this was the time period during which the old accumulation storage area was being moved to the temporary accumulation area due to construction. It appears as though during the move, these logs were not maintained.

The issues above were discussed with facility representatives during the inspection. Please advise this office within ten (10) calendar days if this information is incorrect or if there is any other information that DEQ should consider. Additionally, please take appropriate action to address the second area of non-compliance (#2), and provide applicable documentation to illustrate the prevention of a repetitive occurrence. Please submit your response within thirty (30) calendar days from the date of this letter.

Other than the two areas noted above, your facility was in compliance with the VHWMR. I would also like to take this opportunity to express my compliments on a very clean and orderly facility. In addition, the facility's paperwork, contingency plan, and training efforts were very thorough and impressive. As an inspector, I also appreciate the open communication, interaction, and willingness to work with the Department in regards to your hazardous waste program and management.

Please note that this information is not an agency proceeding or determination which may be considered a case decision under the Administrative Process Act (Va. Code §§ 9-6.14.1, et seq.). It does not advise you that facts stated in this notice could provide the basis for a case decision or civil proceedings for non-compliance under Va. Code §§ 10.1-1402.19 and 10.1-1455, or other pertinent section of the Virginia Code, should DEQ take or seek actions authorized by law.

Thank you again for your cooperation and the opportunity to observe operations at your facility. If you have any questions and/or concerns, please do not hesitate to call me at (540) 562-3555.

Sincerely,

*Kimberly Batwinas*

Kimberly Batwinas  
Environmental Inspector Senior  
Waste Compliance Division

c: Mr. Aziz Farahmand, Environmental Program Manager, DEQ-WCRO  
Ms. Claire Slaughter, Office of Technical Assistance, DEQ-HQ  
West Central Regional Office Files

# DEPARTMENT OF ENVIRONMENTAL QUALITY WASTE DIVISION

## SURVEY SHEET FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

**NAME of FACILITY:** *MICROMETRIC SYSTEMS INC*

**ADDRESS:** *2900 W RT 58  
MEADOWS OF DAN VA 24120*

**EPA ID NUMBER:** *VAD075612564*

**FACILITY  
REPRESENTATIVES  
AND TITLES:** *RICHARD STEWART, EMERGENCY COORDINATOR/SUPERVISOR  
ROBIN UNDERWOOD, FOREMAN*

**TELEPHONE  
NUMBERS:** *Phn: (540) 952-2026 Fax: (540) 952-2269*

**INSPECTOR NAME  
AND TITLE:** *KIMBERLY BATWINAS  
ENVIRONMENTAL INSPECTOR SENIOR*

**DATE of INSPECTION:** *29 MAY 1996*

\*\*\*\*\*

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)

*MANUFACTURER OF TOOL & DYES (FOR PAPER PRODUCTS)*

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

**\*\*\* PLEASE SEE PAGE ENTITLED "1995 ANNUAL REPORT SUMMARY" \*\*\***

3. List the highest amounts of hazardous waste generated in one month of a calendar year and highest accumulated for each type of waste generated.

<u>Waste Code</u>	<u>Amount Generated</u>	<u>Amount Accumulated</u>
D002 D006 D007 D008 (FeCl)	avg approx 1700 gal/mo	3428 gal
D002 D007 D008 (NaOH)	avg approx 550 lbs/mo	1647 lbs
D011 (Liquid Silver)	avg approx 780 lbs/mo	916 lbs
F003 D001 (Xylenes)	avg approx 100 lbs/mo	750 lbs
D002 D009 D007 (HCl)	avg approx 1000 lbs/mo	9160 lbs
F001 D039 (episodic)	1995 = mo avg 600 lbs/for 2 mo	1803 lbs

4. Does the facility ever generate greater than: NO  
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)?

100 kg of clean-up from a spill of P listed waste NO  
or F020-F023 and F026-F027 waste?  
If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent?  
(List all transporters and facilities, or on-site treatment performed).

TRANS = SAFETY KLEEN CORP [ILD984908202]  
TRANS = HAROLD MARCUS [MIT270012321]  
TRANS = JB HUNT SPEC COMMOD INC [ARD988908551]  
TSD = PHILBRO-TECH INC [ILD062480850]  
TSD = SAFETY KLEEN CORP [NJD002182897/SCD077995488/KYD053348108/TXD077603371]

6. Does the facility generate any hazardous waste YES  
that is excluded from regulation? If yes,  
list the waste and the basis for exclusion.

NEUTRALIZATION OF WASTEWATER [FROM EVAPORATOR] PRIOR TO DISCHARGE TO PUBLICLY OWNED  
TREATMENT WORKS. EXCLUDED UNDER VHWMR § 3.1.A.2.

7. Does the facility: ~~Generate~~ Market Burn used oil that is burned for energy NO  
recovery? Underline or circle all that are applicable. (If the facility markets or  
burns used oil, fill out the Used Oil Checklist.)

Does the generator of used oil to be burned for energy recovery  
(other than a Conditionally Exempt Small Quantity Generator) mix  
the used oil with hazardous waste? If YES, then fill out NO  
the Used Oil Checklist. USED OIL GENERATED SENT FOR RECYCLING ONLY

8. Does the facility generate any hazardous waste that is reclaimed that is reclaimed to recover economically feasible amounts of gold, ~~silver~~, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? If Yes, list the waste, where it is sent, and complete the **Metals Recovery Checklist**. **NO**

***SILVER SERVICED BY SAFETY KLEEN CORP***

9. Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries? If yes, Underline or circle all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist**. **YES**

***SENT FOR RECYCLING/RECLAMATION TO COMPANIES IN HILLSVILLE OR GALAX LOCATIONS***

10. Based on the above, the facility is a:
- a. conditionally exempt small quantity generator
  - b. small quantity generator
  - c. ~~large quantity generator~~
  - d. permitted or interim status TSD
  - e. unpermitted TSD (explain in comments section)
  - f. transporter
  - g. other: please explain
11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally Exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55 gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.] SA = Satellite accumulation area AA = 90 day accumulation area

<u>Location</u>	<u># of Containers</u>	<u># of Tanks</u>	<u>Capacity</u>
SA-1 [BLDG A/CHROME PLATING]	2	0	55-GAL
AA-1 [BLDG A]	0	1	1500 GAL
AA-2* [BLDG A]	2	0	55 GAL
SA-2 [BLDG B/FILM AREA]	1	0	55 GAL
SA-3 [BLDG B]	1	0	55 GAL
SA-4° [BLDG B/FILM AREA]	1 [CYLINDER]	0	UNK
AA-3 [BLDG B/TANK ROOM]	0	1	UNK
AA-4 [BLDG B/TEMP STRG]	2	0	55 GAL

13. Waste Management Flow Diagram:

(Sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWTP.)

**\*\* PLEASE SEE ATTACHMENT \*\***

14. Comments:

- \* **FACILITY RECENTLY INSTALLED AND BEGAN CHROME PLATING PROCESS. AT TIME OF INSPECTION, SAMPLES WERE PULLED FOR ANALYSES DETERMINATION.**
- \* **FACILITY IS VERY ORDERLY, CLEAN, AND WELL KEPT. SCRAP STEEL IS RECYCLED**
- \* **IT WAS RECOMMENDED DURING THE INSPECTION TO PLACE THE ACTUAL DATE OF 90 DAY STORAGE/ACCUMULATION IN THE PROPER LOCATION OF THE LABEL ENTITLED "ACCUMULATION START DATE". IF THE FACILITY DESIRES TO PLACE THE START DATE OF SATELLITE AREA ACCUMULATION ON THE LABEL, IT WAS ADVISED TO PLACE THIS DATE SOMEWHERE ELSE ON THE HAZARDOUS WASTE LABEL.**
- \* **\*AT THE TIME OF THIS INSPECTION, THIS AREA WAS NOT COMPLETELY DESIGNATED AS AN 90-DAY ACCUMULATION AREA. ANY WASTE THAT WAS PUMPED TO THE TANK (AA-1) WAS PLACED IN CONTAINERS AND SERVICED/PICKED UP BY SAFETY KLEEN. ON 29 MAY 1996, THERE WERE TWO FULL DRUMS ASIDE FROM THE TANK AREA (AA-1). BASED UPON OUR CONVERSATION, THE DRUMS WERE GENERATED AT THE CHROME PLATING OPERATION AND MOVED TO THIS AREA WHEN FULL. HENCE, THESE DRUMS WERE NOT LOCATED WITHIN IN A SATELLITE LOCATION (NEAR OR AT POINT OF GENERATION) NOR IN A DESIGNATED 90-DAY ACCUMULATION AREA.**

**WE DISCUSSED THE OPTIONS THE FACILITY HAD FOR HANDLING THESE WASTE CONTAINERS. THE FACILITY MADE THE DECISION TO DESIGNATE THE AREA (NEAR THE TANK/WHERE THE TWO DRUMS OF WASTE) AS A 90-DAY ACCUMULATION AREA. THIS WAS DONE, AND THE AREA OF NON-COMPLIANCE WAS CORRECTED BY THE SECOND INSPECTION DATE ON 6/5/96, WHEN THE IT WAS DESIGNATED AS AN ACCUMULATION AREA, THE DRUMS WERE PLACED ON CONTAINMENT PALLETS, THE AREA PROPERLY LABELED, AND CORRECTLY SECURED AS REQUIRED FOR A 90-DAY ACCUMULATION AREA.**

**AS WE DISCUSSED DURING THE TWO INSPECTIONS, THE TANK ITSELF IS A 90-DAY ACCUMULATION AREA DUE TO THE FACT THAT THE ALLOWABLE SATELLITE AREA CAPACITY IS LIMITED TO 55 GALLONS. A REQUIREMENT FOR THIS TANK ACCUMULATION AREA IS THAT THE DATE OF ACCUMULATION BEGIN WHEN THE FIRST DROP OF WASTE ENTERS THE TANK, THEN YOU HAVE TO DISPOSE OF IT WITHIN 90 DAYS. THE WASTE MAY BE ACCUMULATED IN THE TANKS (TO TANK'S CAPACITY OR FOR 90 DAYS, WHICHEVER COMES FIRST) AS OPPOSED TO THE CURRENT METHOD OF PUMPING THE WASTE INTO DRUMS. IT IS PERMISSIBLE TO PLACE THE WASTE INTO DRUMS AS LONG AS THE ACCUMULATION START DATE ON THE DRUMS COINCIDE WITH THE SAME DATE THAT THE WASTE ENTERED THE TANK.**

**IN CONCLSION, THESE TWO AREAS SHOULD BE CONSIDERED AS SEPARATE ACCUMULATION AREAS DUE TO THE FACT THAT 1) ONE WASTE STREAM IS BEING ACCUMULATED IN A TANK (OVER 55 GAL CAPACITY FOR SATELLITE AREAS), AND 2) EACH HAS ITS SEPARATE CONTAINMENT SYSTEM AND LABELING.**

- \* **✱ THIS AREA IS NOT A DESIGNATED SATELLITE ACCUMULATION AREA. IT IS NOTED ABOVE TO DOCUMENT THAT IT IS AN AREA IN WHICH HAZARDOUS WASTE IS GENERATED. THE PROCESS LOCATED HERE IS A SILVER RECOVERY UNIT FROM WHICH THE D011 WASTE [IN CYLINDERS] IS REMOVED/SERVICED FROM "IN PROCESS" BY THE TRANSPORTER/TSO COMPANY AND THERE IS ACTUALLY NO SATELLITE CONTAINER PRESENT.**

**MICROMETRIC SYSTEMS INC**  
**2900 W RT 58**  
**MEADOWS OF DAN VA 24120**  
**VAD075612564**

**DESCRIPTION OF WASTE STREAMS & ANNUAL REPORT 1995 SUMMARY**

<b>WASTE STREAM</b>	<b>WASTE CODE(S)</b>	<b>QUANTITY GENERATED</b>	<b>MANAGEMENT METHOD</b>
SPENT HALOGENATED SOLVENT : CONTAINS TETRACHLOROETHYLENE (FROM CLEANING OPERATION IN TOOL PRODUCTION)	F001 D039	1,466 LBS	OFF SITE SOLVENT RECOVERY
SPENT HALOGENATED SOLVENT : CONTAINS TETRACHLOROETHANE (PARTS CLEANING OPERATION IN TOOL PRODUCTION)	F001	1,190 LBS	OFF SITE SOLVENT RECOVERY
SPENT HALOGENATED SOLVENT : CONTAINS 1,1,1-TRICHLOROETHANE (PARTS CLEANING OPERATION IN TOOL PRODUCTION)	F001 D039	984 LBS	OFF SITE INCINERATION - LIQUIDS
CORROSIVE SPENT SOLVENT : CONTAINS 1,1,1-TRICHLOROETHANE (PARTS CLEANING IN TOOL OPERATION)	F001 D002 D001	113 LBS	OFF SITE FUEL BLENDING
FLAMMABLE SPENT SOLVENT : ETHYL BENZENE & XYLENES (METAL DEVELOPING PROCEDURE)	D011 D001 F003	750 LBS	OFF SITE FUEL BLENDING
KODAK DEVELOPER/FIXER CONTAINING SILVER (PHOTOPROCESSING OPERATION)	D011	7,762 LBS	OFF SITE TRTMNT (TYPE UNKNOWN)
CORROSIVE WASTE FERRIC CHLORIDE/HYDROCHLORIC ACID (METAL ETCHING PROCEDURE)	D002 D006 D007 D008	19,973 GAL	OFF SITE ACID REGENERATION
CORROSIVE SPENT SOLVENT & DEGREASER CONTAINING SODIUM HYDROXIDE (PARTS CLEANING OPERATION)	D002	42 LBS	OFF SITE FUEL BLENDING
CORROSIVE SPENT SOLVENT CONTAINING HYDROCHLORIC ACID (PARTS STRIPPING OPERATION IN TOOL PRODUCTION)	D002 F002 F001 F004 D026	531 LBS	OFF SITE FUEL BLENDING

Generator may generate additional waste episodically

**NON HAZARDOUS WASTE STREAMS INCLUDE THE FOLLOWING:**

Waste Water/Etch Rinse	Ship to Stewart POTW
Water Sink Waste/Rinse	Evaporate & ship to Stewart POTW
Waste Oil & Water Mixture	Safety Kleen Corp
Used Oil	Recycled; Necessary Oil



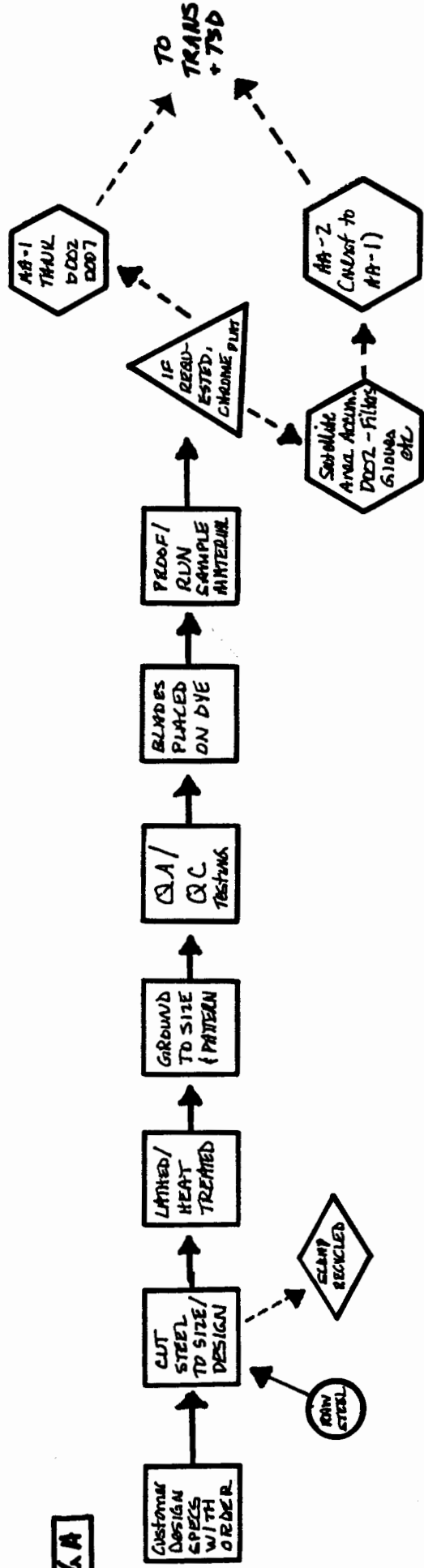
MICROMETRIC SYSTEMS INC.

VAD 075612564

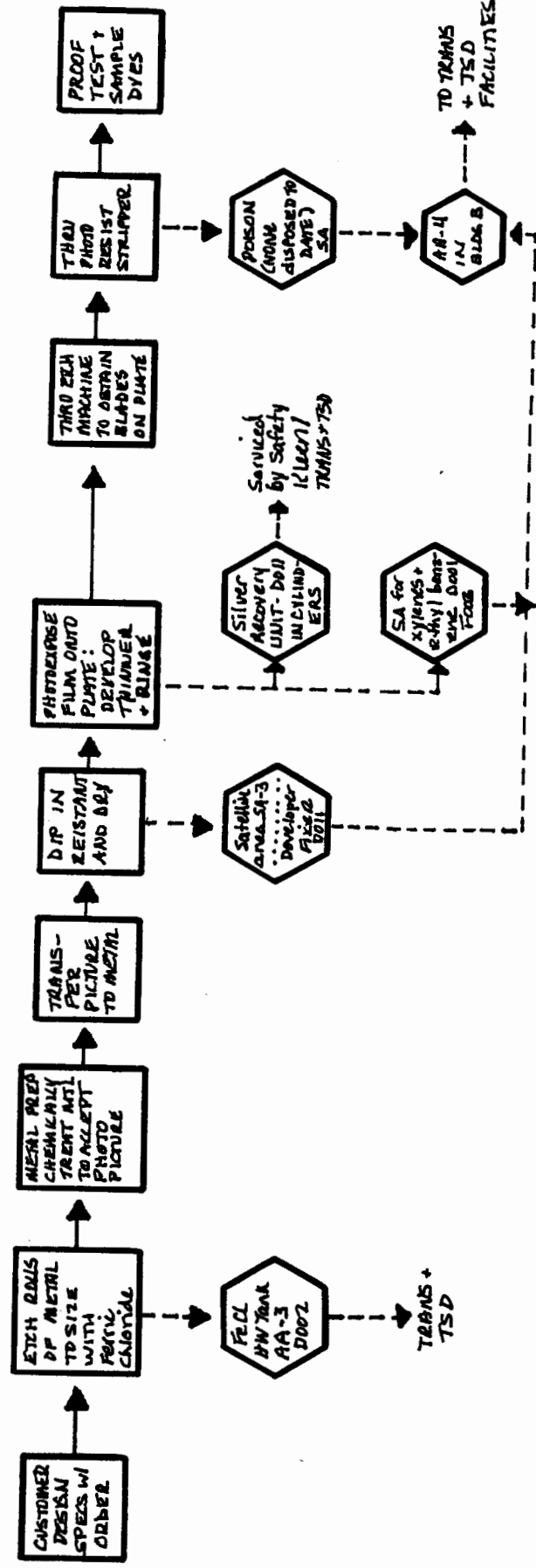
2900 W. RT 58

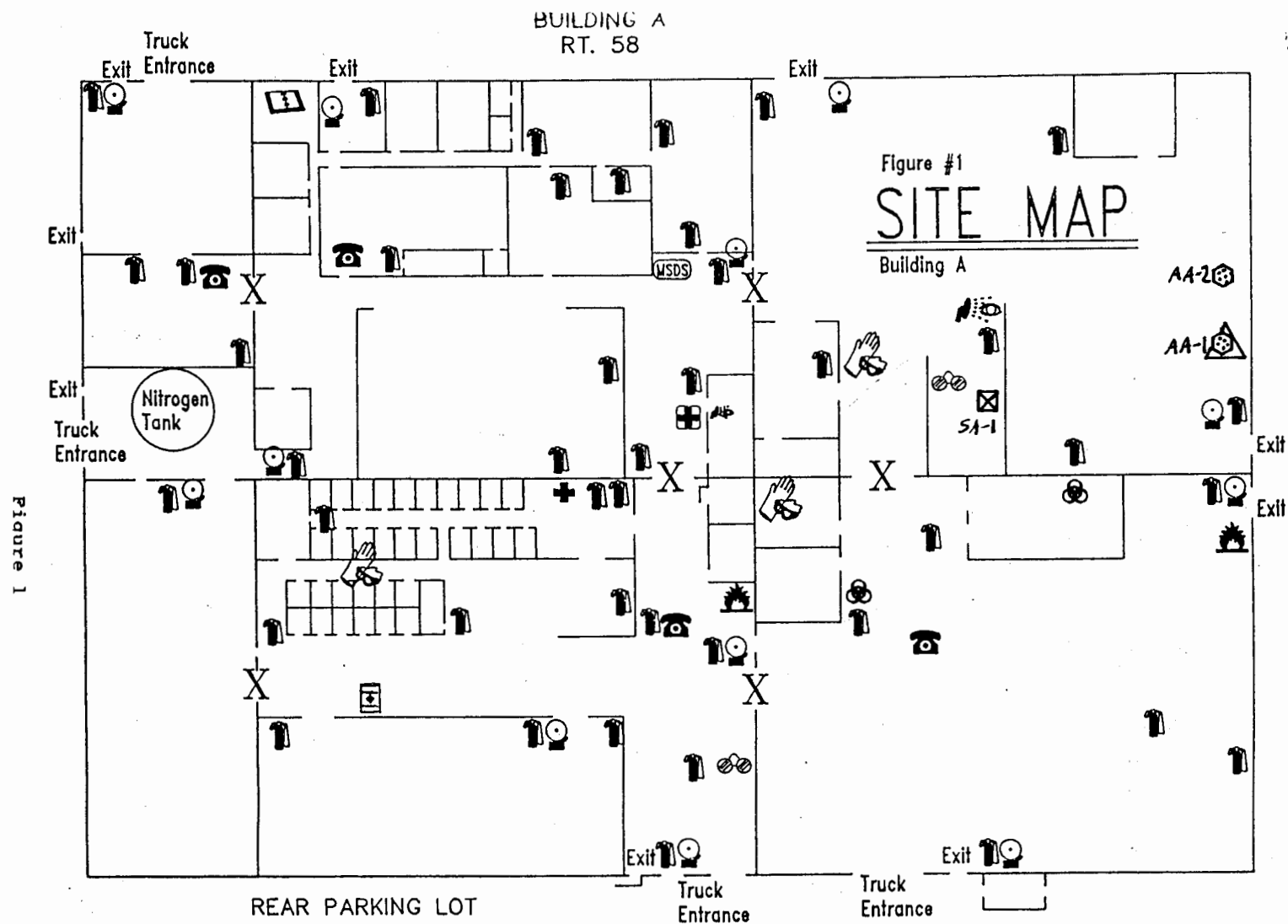
MEADOWS OF DAN VA 24120

**BLDG A**



**BLDG B**





## KEY

Phone/Intercom	First Aid Kit	Contingency Plans	Fire Extinguisher	Flammable	Satellite Area (SA)
Shower/Eyewash	First Aid	Protective Equipment	Respirator	Steel Containment Door (closed during emergency)	90 DAY ACCUMULATION AREA
Chem. Storage	Alarm	Material Safety Data	Emergency Spill		

**MILROMETRIC SYSTEMS INC**

VAD075612564  
2900 W RT 58  
Meadows of Dan VA 24120



January 1994

## DEPARTMENT OF ENVIRONMENTAL QUALITY WASTE DIVISION

### CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF LARGE QUANTITY GENERATORS (LQG)

FACILITY NAME: **MICROMETRIC SYSTEMS INC**

EPA ID NUMBER: **VAD075612564**

INSPECTION DATE: **29 MAY 1996**

NOTE: \* means Non-Compliance

#### VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/ SECTION	REGULATION	YES NO N/A
6.3.	1. Is a manifest system currently being used for all hazardous waste shipped off site?	YES
6.2.C.	2. Has the generator determined that the facility has an EPA ID number?	YES
5.5.A.7.	3. Has the generator determined that the transporter has a valid EPA ID number and a valid Virginia Transporter permit?	YES
6.3. 5.3.B.	4. Is the following information on the manifest:	
5.3.B.1.	A. The generator's name, mailing address, EPA ID number, and telephone number?	YES
5.3.B.2.	B. A unique five digit number assigned to the manifest by the generator?	YES
5.3.B.3.	C. The total number of pages of the manifest?	YES
5.3.B.4.	D. The company name and EPA ID number of each transporter used?	YES
5.3.B.5.	E. The company name, site address, and EPA ID number of the facility designated to receive the waste?	YES
5.3.B.6.	F. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?	YES
5.3.B.7.	G. The quantities of waste being shipped? and	YES

PART/ SECTION	REGULATION	YES NO N/A
5.3.C.	<p>H. The following certification:</p> <p>I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment. OR, If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.</p>	YES
6.5.C.1.b.	5. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago?	YES
6.5.C.1.b.	6. If no, has the generator filed an exception report with the Executive Director?	N/A
6.5.C.1.b.	7. Does the exception report include:	
6.5.C.1.b.(1)	A. A legible copy of the manifest for which the generator does not have confirmation of the delivery? and	N/A
6.5.C.1.b.(2)	B. A cover letter explaining the efforts taken to locate the shipment?	N/A
6.4.E.1.d. 9.1.G.1.	8. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures?	YES
9.1.G.2.	9. Have new employees to the facility successfully completed training mentioned above within six months of their employment or assignment to the facility?	YES
9.1.G.3.	10. Do personnel participate in an annual review of the initial training?	YES
9.1.G.4.	11. Does the owner/operator maintain the following documents and records at the facility:	
9.1.G.4.a.	A. Job titles for each position at the facility related to hazardous waste management?	YES
9.1.G.4.a.	B. The name of the employee filling each job?	YES
9.1.G.4.b.	C. A written job description for each position in 11.A. above?	YES
9.1.G.4.c.	D. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in 11.A. above? and,	YES
9.1.G.4.d.	E. Records that document that the training or job experience required above has been given to, and completed by facility personnel?	YES

PART/ SECTION	REGULATION	YES NO N/A
6.4.E.1.d. 9.2.B. 9.2.D.	12. At the facility, is the following equipment installed:	
9.2.B.1.	A. An internal communications or alarm system capable of providing immediate emergency instruction to facility personnel if the hazardous waste generation or accumulation areas are threatened by hazardous waste release, fire or explosion? <b>** INTERCOM &amp; FIRE ALARMS **</b>	YES
9.2.B.2.	B. A device (at the scene of hazardous waste generator operations) capable of summoning emergency assistance from Police, Fire Departments, etc.? <b>* ALARMS/PHONES/SECURITY ALARMS TO CONTRACTED SECURITY CO *</b>	YES
9.2.B.3.	C. Portable fire extinguishers, fire control equipment and decontamination equipment? <b>* REFER TO CONTINGENCY PLAN FOR LOCATIONS *</b>	YES
9.2.B.4.	D. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? <b>* FACILITY ON WELL WATER; FIRE DEPT W/TANKER TRUCKS &amp; FOAM *</b>	YES
9.2.C.	13. Is the above equipment tested and maintained as necessary to assure proper operation and is a record of the tests and inspections maintained on a log at the facility?	YES
9.2.E.	14. Does the facility have adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment during emergencies? <b>* OPENED FLOOR PLAN; VERY SPACIOUS. EQUIPMENT LOCATED IN CONTINGENCY PLAN *</b>	YES
6.4.E.1.d. 9.1.F.4.	15. Does the generator record inspections of the accumulation area at his facility in an inspection log? <b>** PLEASE SEE COMMENTS **</b>	NO *
9.2.F.1.	16. Has the facility attempted to arrange agreements with the local authorities such that:	
9.2.F.1.a.	A. The police, fire and emergency response teams are familiar with the layout of the site, the properties of the hazardous waste handled at the site, normal working areas, entrances to roads inside the facility and possible evacuation routes? <b>** SEND COPIES OF CONTING PLAN. SEVERAL EMPLOYEES ARE FIREMEN WITH THE NEAREST FD, THUS VERY FAMILIAR WITH LAYOUT OF SITE **</b>	YES
9.2.F.1.b.	B. Where more than one police and fire department might respond to an emergency, do agreements specify a primary emergency authority?	YES
9.2.F.1.c.	C. Agreements with Commonwealth emergency response teams, emergency response contractors and equipment suppliers are specified? and	YES
9.2.F.1.d.	D. The local hospital is familiar with the properties of the hazardous wastes handled and the types of injuries or illnesses which could result from fires, explosions, or releases? <b>* TRI AREA MEDICAL CLINIC NEAREST FACILITY *</b>	YES
6.4.E.1.d. 9.3.A.1.	17. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water? <b>* IMPRESSIVE CONTINGENCY PLAN. VERY THOROUGH &amp; ORGANIZED *</b>	YES

PART/ SECTION	REGULATION	YES NO N/A
9.3.B.	18. Does the contingency plan contain the following elements:	
9.3.B.(1,2)	A. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water?	YES
9.3.B.3.	B. A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors and Commonwealth and local emergency response teams to coordinate emergency services, as required?	YES
9.3.B.4.	C. A listing of names, addresses, and office and home phone numbers of all persons qualified to act as emergency coordinator? List primary Coordinator.  <b>NAME: RICHARD STEWART</b> <b>TITLE: SUPERVISOR/EMERGENCY COORDINATOR</b> <b>PHONE: Home: (540) 789-7424 Office (540) 952-2026</b>	YES
9.3.B.5.	D. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? Does this list of emergency equipment specify the location and physical description of each item on the list and a brief outline of its capabilities?	YES
9.3.B.6.	E. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? * <b>VERY DETAILED &amp; EXPLICIT INSTRUCTIONS</b> *	YES
9.3.C.2.	F. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? ** <b>SEE LIST IN "COMMENTS"</b> **	YES
9.3.F.	19. Has the contingency plan ever been implemented?	NO
9.3.F.(9,10)	20. If yes, was a written report filed with the Director within 15 days and were the Director and other required authorities properly notified before operations resumed?	N/A
6.5.A.1., 2., & 3.	21. Does the generator retain copies of all manifests, annual reports, exception reports, test results, and waste analysis for at least three years?	YES
6.5.B.1.	22. Has the facility submitted an annual report for the preceding calendar year by March 1? ** <b>1995 ANNUAL REPORT SUBMITTED AND DATED 2/22/96</b> **	YES
6.4.E.7.	23. Does the generator who manages HW prohibited under Part XV treat waste in tanks and containers? If yes, must meet requirements of 6.4.E. and 15.1.G.1.d.	NO
15.1.G.1.d.	24. If the generator treats waste in tanks or containers, has the generator developed a written waste analysis plan and kept on-site in the generator's records. Has the generator filed a plan with director at least 30 days prior to treatment.	N/A
6.5.D.	25. Has the generator ever submitted a release report if responsible for release of HW which threatens public health. (Must notify NRC, local Government, the Department.)	NO
6.4.E.2.	26. Does the generator accumulate (store) hazardous waste in containers or tanks on-site for greater than 90 days? If yes, interim status or a TSD permit is required. (Up to a 30 day extension may be granted by the Director.)	NO

PART/ SECTION	REGULATION	YES NO N/A
6.4.E.1.e.	27. Has the generator notified the Executive Director by March 1, 1988, of the exact location of the existing container and tank accumulation areas, and at Least 15 days prior to use for subsequently established accumulation areas? <b>** PLEASE SEE COMMENTS **</b>	NO *
6.4.E.1.a.(1) 9.8.	28. The Use and Management of Containers for 90 Day Accumulation Areas:	
6.4.E.1.a 9.8.B.	29. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? If <b>No</b> , list the accumulation areas where there are problems and the type of problems.	YES
6.4.E.1.a. 9.8.C.	30. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?	YES
6.4.E.1.b.	31. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container? <b>* SEE THIRD COMMENT IN SURVEY CHECKLIST *</b>	YES
6.4.E.1.c.	32. Is the container labeled or marked clearly with the words "Hazardous Waste".	YES
9.8.D.1.	33. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste? If <b>No</b> , list the locations where open containers are found.	YES
9.8.E.	34. Are the areas where hazardous waste containers are stored inspected by the owner/operator at least weekly? <b>* SEE COMMENTS *</b>	NO *
9.8.F.	35. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line?	YES
9.8.G.1.	36. Are incompatible wastes placed in separate containers?	YES
9.8.G.3.	37. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?	YES
6.4.E.3.a.	38. Does the generator have satellite accumulation areas where up to 55 gal of any one type of HW (1 QT acutely HW) are accumulated? If yes,	YES
6.4.E.3.a.	A. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	YES
6.4.E.3.a.(1) 9.8.B.	B. Are the containers in good condition?	YES
6.4.E.3.a.(1) 9.8.C.	C. Are the containers compatible with the waste?	YES
6.4.E.3.a.(1) 9.8.D.1.	D. Are the containers kept closed except as necessary to add or remove waste?	YES
6.4.E.3.a.(2)	E. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?	YES



PART/ SECTION	REGULATION	YES NO N/A
6.4.E.3.b.	F. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,	NO
6.4.E.3.b.	1) Has the generator marked the excess amount with the date the excess amount began accumulating?	N/A
6.4.E.3.b.	2) Has the generator either removed the excess amount within three days of the date of excess accumulations or has he complied with all other provisions for accumulation areas? Namely, has he notified the Executive Director about the location of the accumulation area?	N/A
	39. PLEASE LIST ANY NEWLY REGULATED WASTE THAT IS NOT LAND RESTRICTED (such as D018-D043, F032, F034 or F035). * NONE *	
15.1.A.2.	40. Does the facility generate, transport, treat, store or dispose any land-restricted wastes? (See VHWMR Part 15) *** SEE COMMENTS ***	YES
15.1.A.3.	41. Is land disposal of wastes occurring? If yes,	NO
15.1.A.3.a.	A. Has the facility been granted an extension to the effective date for land restriction applicable to its restricted waste? OR	N/A
15.1.A.3.b.	B. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR	N/A
15.1.A.3.c.	C. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?	N/A
15.1.E.	42. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?	N/A
15.1.F.	43. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?	NO
15.1.C.1.	44. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?	NO
15.1.D.1.	45. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)	NO
	46. If yes, does the facility meet the following requirements:	
15.1.D.1.b. 15.1.G. 15.3.C. 15.4. 15.3.	A. Are the residues of the treatment analyzed as specified in VHWMR § 15.1.G. or § 15.3.C. to determine if they meet the applicable treatment standards or VHWMR § 15.4. or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR § 15.3?	N/A

PART/ SECTION	REGULATION	YES NO N/A
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	B. Has the owner/operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liner?	N/A
15.1.D.1.c. 10.5.	C. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR § 10.5?	N/A
15.1.D.1.d.	D. Has the owner/operator submitted a written certification to the Executive Director that the requirements of 15.1.D.1.c. have been met which states:  "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted wastes. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." and	N/A
15.1.D.1.d.	E. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?	N/A
15.1.G.1.a.	47. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?	YES
	48. Did the notification include the following information:	
15.1.G.1. a.(1)	A. EPA Hazardous Waste Number?	YES
15.1.G.1. a.(2)	B. The corresponding treatment standards and all applicable prohibitions set forth in VHWMR § 15.3.C.?	YES
15.1.G.1. a.(3)	C. The manifest number associated with the shipment of waste? and	YES
15.1.G.1. a.(4)	D. Waste analysis data, where available?	YES
15.1.G. 1.b.	49. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR § 15.3.C.?	N/A
	50. Did the notification include the following information:	
15.1.G.1. b.(1)(a)	A. EPA Hazardous Waste Number?	N/A
15.1.G.1. b.(1)(b)	B. The corresponding treatment standards and all applicable prohibitions?	N/A
15.1.G.1. b.(1)(c)	C. The manifest number associated with the shipment of waste? and	N/A
15.1.G.1. b.(1)(d)	D. Waste analysis date, where available?	N/A

PART/ SECTION	REGULATION	YES NO N/A
15.1.G.1. b.2.	51. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR § 15.4. and all applicable prohibitions set forth in VHWMR § 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."	N/A
15.1.G.1.c.	52. Has the generator received a case-by-case exemption on restricted waste, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?	NO
15.1.G.1.g.	53. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	YES
15.5.	54. Is the generator storing land restricted waste? (For one year storage only)	NO
15.5.1.a.	55. If yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?	N/A

**Comments:**

**#15:** ACCUMULATION LOGS ON MAINTAINED IN BOTH BUILDINGS AT AND NEAR THE AREA OF STORAGE/ACCUMULATION. HOWEVER, FACILITY FAILED TO KEEP WEEKLY ACCUMULATION LOGS FOR THE WEEKS OF 2/17/96 THROUGH 4/19/96. AS WE DISCUSSED DURING THE INSPECTION, IT APPEARS THAT DURING THIS TIME, THE ACCUMULATION AREA WAS BEING MOVED FROM THE OLD 90-DAY ACCUMULATION AREA TO THE TEMPORARY STORAGE AREA, AND THAT LOGS WERE NOT KEPT FOR THESE NINE WEEKS. THE INSPECTION LOGS WERE STARTED AGAIN THE WEEK OF 4/26/96.

**#18.F:** COPIES OF CONTINGENCY PLAN SET TO THE FOLLOWING:

- \* VADEQ-WASTE DIVISION (RECEIVED DURING INSPECTION)
- \* LAUREL FORK FIRE DEPT
- \* LAUREL FORK RESCUE SQUAD
- \* MEADOWS OF DAN FIRE DEPT
- \* VESTA RESCUE SQUAD
- \* TRI AREA CLINIC (MEDICAL)
- \* PATRICK COUNTY SHERIFF DEPT
- \* PATRICK COUNTY LEPC

**#27:** PLEASE REFER TO FACILITY MAPS AND PG 4 OF THE SURVEY CHECKLIST  
THE FACILITY FAILED TO IDENTIFY AND NOTIFY THE DEPT BEFORE UTILIZING ONE ACCUMULATION AREA (AA-2). THIS DEFICIENCY WAS CORRECTED ON 6/5/96 WHEN THIS INSPECTOR WAS NOTIFIED OF THIS ACCUMULATION AREA AND THE PROPER 90-DAY ACCUMULATION AREA REQUIREMENTS WERE IN PLACE. AS REQUESTED DURING THE INSPECTION, PLEASE MAKE SURE TO NOTIFY AN INSPECTOR IN THIS OFFICE 15 DAYS PRIOR TO USEAGE OG THE NEWLY PROPOSED 90-DAY ACCUMULATION AREA.

**#34:** WEEKLY ACCUMULATION LOGS WERE KEPT FOR THE BLDG A DESIGNATED ACCUMULATION AREA #1. HOWEVER, LOGS WERE NOT MAINTAINED FOR THE NEWLY ESTABLISHED ACCUMULATION AREA #2. PLEASE NOTE THAT SINCE THIS HAS BEEN DESIGNATED AS AN 90-DAY ACCUMULATION AREA ON 6/5/96, THEN INSPECTIONS OF THIS AREA MUST ALSO BE PERFORMED AND MAINTAINED IN A LOG. IT IS ALLOWABLE TO COMBINE ALL THE AA AREAS ONTO ONE LOG/INSPECTION FORM.

ACCUMULATION LOGS WERE ALSO KEPT IN BLDG B FOR THOSE AREAS WITHIN THAT BLDG. HOWEVER, THERE WERE NO RECORDS OF INSPECTIONS WITHIN BLDG B FOR THE WEEKS OF 2/17/96 - 4/19/96.

**#40:** Land Ban Wastes: D001 D002 D006 D007 D008 D009 D011

January 1994

# DEPARTMENT OF ENVIRONMENTAL QUALITY WASTE DIVISION

## CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF TANKS

FACILITY NAME: **MICROMETRIC SYSTEMS INC**

EPA ID NUMBER: **VAD075612564**

INSPECTION DATE: **29 MAY 1996**

NOTE: \* means Non-Compliance

### VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/ SECTION	REGULATION	YES NO N/A
6.4.E.1.e.	1. Has the generator notified the Executive Director of the location of all hazardous waste tank accumulation areas?	YES
	A. List all of the tank accumulation areas and give a brief description of each one in the <b>Comment Section</b> . Include the age of each tank, if known and the type of waste accumulated.	
6.4.E.2.	B. Is the tank used to accumulate hazardous waste for greater than 90 days? If YES,	NO
	C. Then has the facility applied for a hazardous waste <b>Storage Permit</b> ? ( If NO, complete the <b>Unauthorized Facility Checklist</b> ).	N/A
6.4.E.1.c.	2. Is each tank marked with the words "Hazardous Waste"?	YES
9.9.A.1.	3. Is the tank used to store or treat hazardous waste that contains no free liquids as demonstrated by the Paint Filter Liquids Test (i.e., solids only)? If yes, exempted from 9.9.D.(Items # 5-15 below.)	NO
9.9.A.2.	4. Does the tank (including sumps) serve as part of a primary secondary containment system to collect or contain releases of hazardous waste? If yes, exempted from 9.9.D.(Items # 5-15 below.)	NO
9.9.D.1.	5. Has secondary containment been provided for each of the following units in order to prevent the release of HW to the environment:	
9.9.D.1.a.	A. New tank systems installed since January 1, 1988?	YES
9.9.D.1.b.	B. Existing tanks used to store or treat F020, F021, F022, F023, F026, or F027?	N/A
9.9.D.1.c.	C. Existing tanks whose documented age is greater than fifteen years of age?	N/A

PART/ SECTION	REGULATION	YES NO N/A
9.9.D.1.c.	D. Existing tanks whose documented age is less than fifteen years of age? If yes, when will the tank become fifteen years old? <b>** The year 2008 **</b>	YES
9.9.D.1.d.	E. Existing tanks for which the age cannot be documented within eight years of January 12, 1987? But, if facility is greater than 7 years old, by time reaches 15 year old? If yes, when will the facility become fifteen years old?	N/A
9.9.D.1.e.	F. Tank systems that store or treat materials that become hazardous wastes subsequent to January 12, 1987, within time intervals required in §9.9.D.1.a. through 9.9.D.1.d.?	N/A
9.9.D.2.	6. Does the secondary containment provided for units above meet the following requirements:	
9.9.D.2.a.	A. Is the secondary containment designed, installed and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, groundwater, or surface water at any time during the use of the tank system?	YES
9.9.D.2.b.	B. Is the secondary containment system capable of detecting and collecting any releases and accumulated liquids until the collected material can be removed?	YES
9.9.D.3.a.	C. Is the secondary containment constructed of or lined with materials that are compatible with the waste(s) to be placed in the tank system and of sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions, stress of installation, and the stress of daily operation?	YES
9.9.D.3.b.	D. Is the secondary containment placed on a foundation or base capable of providing support to the secondary containment system and resistance to pressure gradients above and below the system owing to settlement, compression or uplift?	YES
9.9.D.3.c.	E. Is the secondary containment provided with a leak-detection system that is designed or operated so that it will detect the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours or at the earliest practicable time if the existing detection technology or site conditions will not allow detection of a release within 24 hours? and	YES
9.9.D.3.d.	F. Is the secondary containment system sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills, or precipitation, and has waste that has spilled or leaked and accumulated precipitation been removed from the secondary containment within 24 hours or in as timely a manner as possible to prevent harm to human health or the environment?	YES

PART/ SECTION	REGULATION	YES NO N/A
9.9.D.4.	7. Does the secondary containment for the tanks consist of one or more of the following:	
9.9.D.4.a.	A. A liner (external to the tank);	NO
9.9.D.4.b.	B. A vault; * <b>BLDG B</b> *	YES
9.9.D.4.c.	C. A double-walled tank; * <b>BLDG A</b> * OR	YES
9.9.D.4.d.	D. An equivalent device as approved by the Director?	N/A
	<b>FOR EXTERNAL LINER SYSTEMS ONLY:</b>	
9.9.D.5.a.	8. Is the external liner system:	
9.9.D.5.a.(1)	A. Designed or operated to contain 100% of the capacity of the largest tank within its boundary;	N/A
9.9.D.5.a.(2)	B. Designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient excess capacity to contain the precipitation from a 25 year, 24 hour rainfall event?	N/A
9.9.D.5.a.(3)	C. Free of cracks or gaps? and	N/A
9.9.D.5.a.(4)	D. Designed and installed to completely surround the tank and to cover all surrounding earth likely to come into contact with the waste if released from the tank?	N/A
	<b>FOR VAULT SYSTEMS ONLY:</b>	
9.9.D.5.b.	9. Is the vault system:	
9.9.D.5.b.(1)	A. Designed or operated to contain 100% of the capacity of the largest tank within its boundary?	YES
9.9.D.5.b.(2)	B. Designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system unless the collection system has sufficient capacity to contain the precipitation form a 25 year, 24 hour rainfall event?	YES
9.9.D.5.b.(3)	C. Constructed with chemical-resistant water stops in place at all joints (if any)?	YES
9.9.D.5.b.(4)	D. Provided with an impermeable interior coating or lining that is compatible with stored waste that will prevent migration of waste into the concrete?	YES
9.9.D.5.b.(5)	E. Provided with a means to protect against the formation of and ignition of vapors within the vault, if the waste being stored or treated is ignitable or reactive? and	N/A
9.9.D.5.b.(6)	F. Provided with an exterior moisture barrier or be otherwise designed or operated to prevent migration of moisture into the vault if the vault is subject to hydraulic pressure?	YES
	<b>FOR DOUBLE-WALLED TANKS ONLY:</b>	
9.9.D.5.c.	10. Is the double-walled tank:	

PART/ SECTION	REGULATION	YES NO N/A
9.9.D.5.c.(1)	A. Designed as an integral structure (i.e., an inner tank with an outer shell) so that any release from the inner tank is contained by the outer shell;	YES
9.9.D.5.c.(2)	B. Protected, if constructed of metal, from both corrosion of the primary tank interior and the external surface of the outer shell; and	N/A
9.9.D.5.c.(3)	C. Provided with a built-in, continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time?	YES
	<b>11. FOR ALL TANK UNITS:</b>	
9.9.D.6.	12. Does the tank system have ancillary equipment?	YES
9.9.D.6.	13. If yes, does the ancillary equipment have secondary containment (e.g., trench, jacketing, double-walled piping) which meets the requirements above?	YES
9.9.D.8.	14. For all tank systems for which secondary containment meeting the above requirements has not yet been provided, has the facility complied with the following for the units:	
9.9.D.8.a.	A. For non-enterable underground tanks, has a leak test been conducted at least annually?	N/A
9.9.D.8.b.	B. For other than non-enterable underground tanks and for all ancillary equipment, an annual leak test or other internal inspection or other tank integrity examination by an independent, Virginia registered professional engineer that addresses cracks, leaks, corrosion and erosion conducted at least annually? and	N/A
9.9.D.8.c.	C. Has the owner/operator maintained on file at the facility a record of the results of the above assessments?	N/A
9.9.D.8.d.	15. If found to be leaking or unfit for use, owner/operator shall comply with 9.9.G. (Item # 24) below.	
9.9.B.1.	16. For each existing tank system which does not have secondary containment meeting the requirements of VHWMR Section 9.9.D., has the owner/operator determined that the tank system is not leaking or is unfit for use?	N/A
	17. If yes, is a copy of this written assessment reviewed and certified by an independent Virginia registered professional engineer and kept on file at the facility? (If found to be leaking, must comply with 9.9.G.). (Item # 24 below).	N/A
9.9.E.2.	18. Has the owner/operator used appropriate controls and practices to prevent spills and overflows from tank or secondary containment systems, including:	YES
9.9.E.2.a.	A. Spill prevention controls (e.g., check valves, dry disconnect couplings)?	YES
9.9.E.2.b.	B. Overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank)? <b>** HIGH LEVEL INDICATORS &amp; ALARM, SHUT OFF VALVES **</b>	YES

PART/ SECTION	REGULATION	YES NO N/A
9.9.E.2.c.	C. Maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind action or by precipitation?	N/A
9.9.E.3.	19. Owner/operator shall comply with 9.9.G. below if a leak or spill occurs.	
9.9.F.1.	20. Does the owner/operator inspect the following at least once each operating day:	
9.9.F.1.a.	A. Overfill/spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order?	YES
9.9.F.1.b.	B. The aboveground portions of the tank system, if any, to detect corrosion or releases of waste?	YES
9.9.F.1.c.	C. Data gathered from monitoring equipment and leak detection equipment (e.g., pressure and temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design; and	YES
9.9.F.1.d.	D. The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures to detect erosion or signs or releases of hazardous waste?	YES
9.9.F.2.	21. For all underground and in-ground hazardous waste storage tanks, are cathodic protection systems present?	N/A
	22. If yes, is the cathodic protection inspected according to the following schedule:	
9.9.F.2.a.	A. The proper operation of the cathodic protection system shall be confirmed within six months after initial installation, and annually thereafter; and	N/A
9.9.F.2.b.	B. All sources of impressed current shall be inspected and/or tested, as appropriate, at least bimonthly (i.e., every other month).	N/A
9.9.F.3. 9.1.F.4.	23. Are the inspections in 9.9.F.1. and 9.9.F.2. documented in the facility operating record or log?	YES
9.9.G.	24. For tank systems or secondary containment which have been determined to be leaking or unfit for use, or from which there has been a leak or spill, has the owner/operator satisfied the following requirements:	
9.9.G.1.	A. Has the owner/operator immediately stopped the flow of hazardous waste into the tank system or secondary containment and inspected the system to determine the cause of release?	N/A
9.9.G.2.a.	B. For releases from the tank system, has the owner/operator within 24 hours or at the earliest practicable time, removed as much of the waste as is necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system?	N/A



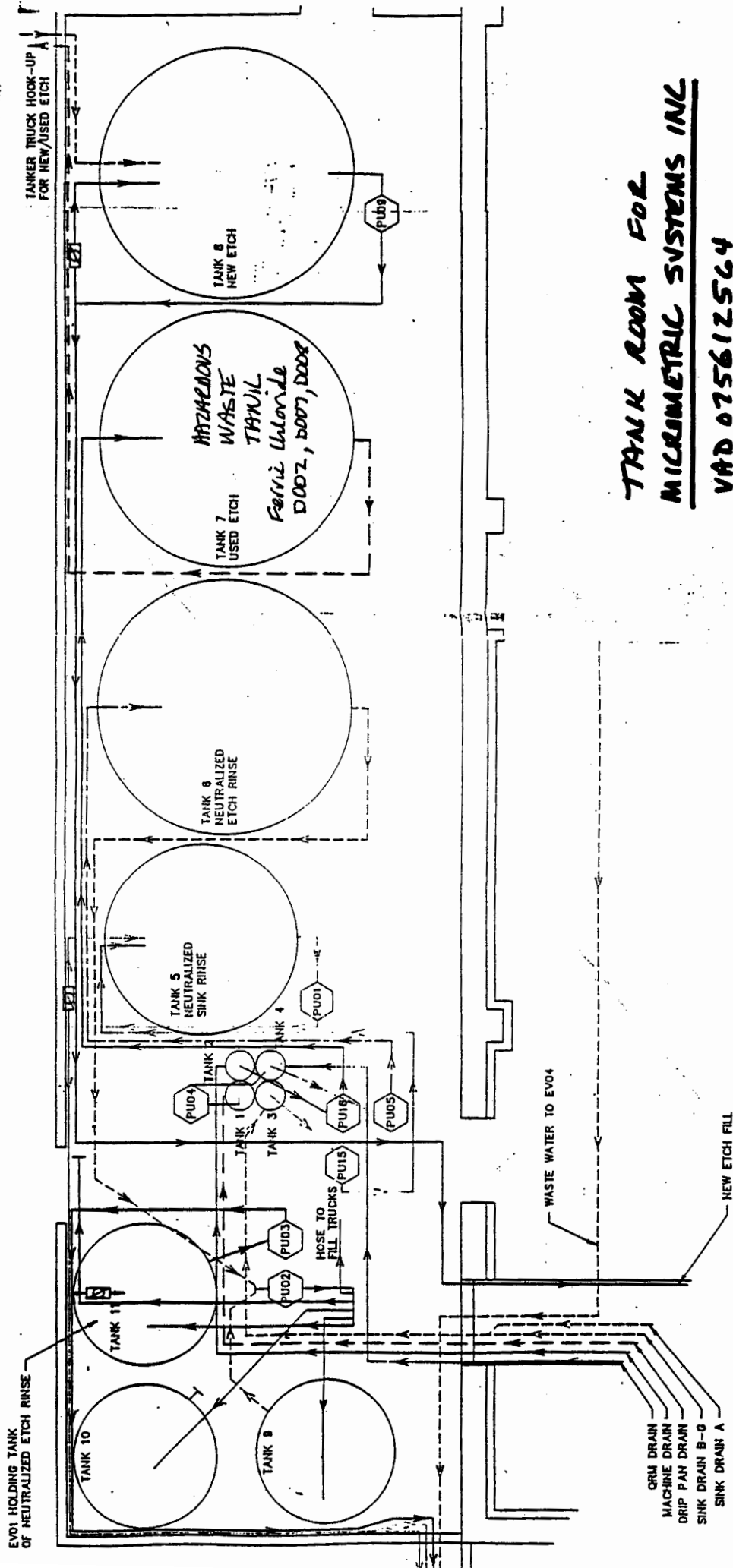
PART/ SECTION	REGULATION	YES NO N/A
9.9.G.2.b.	C. For releases to a secondary containment system, have all released materials been removed within 24 hours or in as timely manner as is possible to prevent harm to human health and the environment? * <b>NO RELEASES</b> *	N/A
9.9.G.3.a.	D. Has the owner/operator prevented further migration of the leak or spills to soils or surface water? and	N/A
9.9.G.3.b.	E.. Has the owner/operator removed and properly disposed of any visible contamination of the soil or surface water?	N/A
9.9.G.4.a.	25. Have all releases to the environment been reported to the Director within 24 hours of detection?	N/A
9.9.G.4.c.	26. Within 30 days of detection of release, has a report been submitted to the Director? <i>See Comments in LQG checklist for #19.</i>	N/A
	27. If yes, did the report contain the following information:	
9.9.G.4.c.(1)	A. Likely route of migration of the release?	N/A
9.9.G.4.c.(2)	B. Characteristics of the surrounding soil?	N/A
9.9.G.4.c.(3)	C. Results of any monitoring or sampling conducted in connection with the release, if available, or as soon as they became available?	N/A
9.9.G.4.c.(4)	D. Proximity to downgradient drinking water, surface water, and population areas; and	N/A
9.9.G.4.c.(5)	E. Description of response actions taken or planned?	N/A
9.9.G.5.c.	28. If the cause of the release was a leak from the primary tank system into the secondary containment system, was the system repaired prior to returning the tank system to service?	N/A
9.9.G.5.d.	29. If the cause of the release was a leak to the environment from an underground or on-ground component of a tank system without secondary containment, did the owner/operator provide secondary containment before returning the unit to service?	N/A
9.9.G.5.d.	30. If the cause of the release was a leak to the environment from an aboveground component of a tank system without secondary containment, was the component visually inspected and repaired?	N/A
9.9.G.6.	31. For all units which have been repaired, if any, did the owner/operator obtain certification from an independent, Virginia registered professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system prior to returning the unit to service?	N/A
9.9.H.1.	32. At closure of any hazardous waste tank system, did the owner/operator remove or decontaminate all hazardous waste residues, contaminated containment system components, contaminated soil, and structures and equipment contaminated with waste, and manage them as hazardous waste?	N/A
9.9.I.	33. Are ignitable or reactive wastes placed in the tank system? If yes,	NO

PART/ SECTION	REGULATION	YES NO N/A
9.9.I.1.a.	A. Was the waste treated, rendered or mixed before or immediately after placement in the tank system so that the resulting waste, mixture or dissolved material no longer meets the definition of ignitable or reactive waste; OR	N/A
9.9.I.1.b.	B. The waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react; OR	N/A
9.9.I.1.c.	C. The tank system is used solely for emergencies?	NO
9.9.I.2.	D. Does the owner/operator comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys or an adjoining property line as required in NFPA's "Flammable and Combustible Liquids Code"?	N/A
9.9.J.1.	34. Are incompatible wastes, or incompatible wastes and materials placed in the same tank system?	NO
9.9.J.2.	35. If yes, was the tank and all related equipment decontaminated first?	N/A
	For Treatment, Storage Facilities only.	
9.9.K.	36. If yes, does the facility meet the following requirements:	
9.9.K.1.	A. Did the owner/operator first conduct waste analyses and trial treatment or storage tests?	N/A
9.9.K.2.	B. Did the owner/operator obtain written, documented information on similar waste under similar operating conditions to show that the proposed treatment or storage will not cause the tank, ancillary equipment or the secondary containment to rupture, leak, corrode or otherwise fail?	N/A

**Comments:**

\* # 1-A:

LOCATION	# TANKS	CAPACITY OF TANK	TYPE OF WASTE STORED IN TANKS
BUILDING A	1	1,500 GAL	WASTE CORROSIVE LIQUIDS [002 D007 D009]
BUILDING B TANK ROOM [TANK #7]	1	3,500 GAL	WASTE FERRIC CHLORIDE SOLN [002 D007 D008]



**TANK ROOM FOR  
MICROMETRIC SYSTEMS INC**

**VAD 075612564**

**2900 W RT 58**

**MEADOWS OF DAN VA 24120**



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen  
Governor

Becky Norton Dunlop  
Secretary of Natural Resources

WEST CENTRAL REGIONAL OFFICE  
3035-E Peters Creek Road N.W.  
Roanoke, VA 24019  
(540) 562-3555  
FAX (540) 562-3565  
<http://www.deq.state.va.us>

Thomas L. Hopkins  
Director

Thomas L. Henderson  
Regional Director

August 1, 1996

Mr. Richard Stewart  
Micrometrics Systems  
2900 West Route 58  
Meadows of Dan VA 24120

RE: RCRA Inspection Report Response  
Inspection Date of May 29, 1996  
EPA ID# VAD075612564

Dear Mr. Stewart:

Thank you for your response dated July 16, 1996 addressing the one area of non-compliance with the Virginia Hazardous Waste Regulations (VHWMR). The non-compliance issue was noted during the inspection held on May 29, 1996 and subsequently addressed in the Compliance Evaluation Inspection report dated July 3, 1996.

Your facility was cited for not maintaining weekly inspection logs for the 90-day accumulation area for the weeks of 2/17/96 through 4/19/96. As described in your letter, the implementation of having the supervisory personnel initial the weekly forms (in addition to the person who already performs the inspections) is a procedure which should prevent a reoccurrence of this non-compliance. Thus, based upon your actions and response, Micrometrics Systems has returned to compliance with the Virginia Hazardous Waste Management Regulations (VHWMR).

Thank you for your cooperation which you have illustrated throughout the inspection process. If you have any questions or if I can be of assistance in the future, please do not hesitate to call me at (540) 562-3555.

Sincerely,

A handwritten signature in cursive script that reads "Kimberly Batwinas".

Kimberly Batwinas  
Environmental Inspector Senior  
Waste Compliance Division

C: Ms. Claire Slaughter, Office of Technical Assistance, DEQ-Waste  
Mr. Aziz Farahmand, Waste Environmental Program Manager, DEQ-WCRO  
West Central Regional Office Files



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

James S. Gilmore, III  
Governor

John Paul Woodley, Jr.  
Secretary of Natural Resources

**West Central Regional Office**  
3019 Peters Creek Road, Roanoke, Virginia 24019  
Telephone (540) 562-6700, Fax (540) 526-6725  
<http://www.deq.state.va.us>

Dennis H. Treacy  
Director  
Thomas L. Henderson  
Regional Director

April 27, 1999

Mr. Richard Stewart, Supervisor  
MicroMetrics Systems  
225 Jeb Stuart Highway  
Meadows of Dan, Virginia 24120

Re : MicroMetrics Systems  
EPA I.D. Number VAD075612564  
Response to Compliance Evaluation Inspection Report

Dear Mr. Stewart:

Thank you for your response dated April 14, 1999, addressing the deficiencies in the compliance evaluation inspection report dated April 5, 1999. Responses were required for deficiencies 1. and 3. in the inspection and were given as follows:

1. Based on your response, MicroMetrics has implemented a manifest log. For each hazardous waste shipment, a new manifest number will be assigned and entered into the log to avoid duplication of numbers.
3. Based on your response, MicroMetrics has revised the weekly inspection log to include evaluation of the greatest number of days hazardous waste has been accumulated on-site.

Thank you for your cooperation and prompt response to the deficiencies noted during the inspection. If you should have any questions or need additional information, please do not hesitate to contact me at (540)562-6799.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elizabeth A. Lohman".

Elizabeth A. Lohman  
Environmental Inspector Senior

CC : Mr. Aziz Farahmand, DEQ-WCRO Environmental Program Manager  
Ms. Claire Ballard, DEQ-OTA  
WCRO Files



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

James S. Gilmore, III  
Governor

John Paul Woodley, Jr.  
Secretary of Natural Resources

### ***West Central Regional Office***

3019 Peters Creek Road, Roanoke, VA 24019  
Phone (540) 562-6700 FAX (540) 562-6725  
<http://www.deq.state.va.us>

Thomas L. Hopkins  
Director

Thomas L. Henderson  
Regional Director

April 21, 1998

Mr. Rocky O. Sutphin  
Rt. 1 Box 118 AA  
Laurel Fork, VA 24352

RE: Freedom of Information Act Request:  
Micrometrics Systems Inc.

Dear Mr. Sutphin:

I have received your faxed letter dated April 14, 1998, requesting information on the above referenced company. Per your phone conversation of April 20, with Mary Monroe, please find enclosed the hazardous waste inspection report of May 29, 1996 and Pollution Complaint PC94-2944. If you have any questions or need further assistance, please contact me at (540) 562-6700.

Sincerely,

A handwritten signature in cursive script that reads "Wanda L. Bowman".

Wanda L. Bowman  
Office Manager - FOIA Custodian

WLB: msm

Enclosure